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FILED

SEP 29 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

9 UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 UNITED STATES OF AMERICA,)

13 Plaintiff,)

14 vs.)

15 TRACY MARASCO, XERXES)
16 FLORES ZAPATA, JACK STRINGER,)
17 and RUSSELL ALLGIRE,)

18 Defendants.)

CASE NO. CR 11-00295 EJD
HRL

STIPULATION OF THE PARTIES AND
PROPOSED ORDER FOR ORDER TO
PERMIT TRACY MARASCO TO
TRAVEL TO NEVADA FOR
FAMILY REUNION.

19 Defendant Tracy Marasco and Plaintiff United States of America, through their
20 respective counsel, stipulate to a joint request for a court order modifying Defendant Tracy
21 Marasco's pretrial release condition so that she can travel to and from Las Vegas, Nevada,
22 from October 7, 2011, to and through October 10, 2011, for a brief family reunion with her
23 mother and her aunt (both of whom will be traveling from their home in Hawaii). Ms.
24 Marasco's present pretrial release condition does not permit her to travel outside the Eastern
25 District of California (where she resides) and the Northern District of California. Her pretrial
26 service officer, Ms. Lydia Serrano (in Fresno, California), and the AUSA handling this case,
27 Mr. Jeff Nedrow, do not object to this trip. So stipulated.
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3 DATED: September 28, 2011

/S/
JERRY Y. FONG, Attorney for
Def. TRACY MORASCO

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7 DATED: September 28, 2011

/S/
JEFFREY D. NEDROW, AUSA for
Plaintiff UNITED STATES OF AMERICA

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12 [PROPOSED] ORDER

13 Pursuant to the parties' stipulation and good cause appearing herein, it is hereby
14 ordered that Defendant Tracy Marasco's pretrial release conditions shall be modified so that
15 she may travel to and from Las Vegas, Nevada, from October 7, 2011, to and through
16 October 10, 2011, to attend the reunion with her family. It is so ordered.

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21 DATED:

9/29/11


MAGISTRATE-JUDGE OF THE UNITED
STATES DISTRICT COURT